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8 UNITED STATES DISTRICT COURT  
9  
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 MICHAEL GARCIA, SALENA GARCIA,  
AND R.G., a minor by and through her  
12 guardians Michael Garcia and Salena  
Garcia, on behalf of themselves and all  
13 others similarly situated,

14 Plaintiffs,

15 v.

16 ROBLOX CORPORATION,  
17 Defendant.

Case No. 2:25-cv-03476

**DECLARATION OF RONITA  
JIT IN SUPPORT OF  
DEFENDANT ROBLOX  
CORPORATION'S MOTION  
TO COMPEL ARBITRATION**

Date: November 14, 2025  
Time: 1:30 p.m.  
Dept: 9B  
Judge: Judge Wesley L. Hsu

18 I, Ronita Jit, declare as follows:

19 1. I am a Senior Paralegal, Litigation and Legal Operations at Roblox  
20 Corporation ("Roblox"). Since January 31, 2023, I have been responsible for  
21 supporting litigation needs, including assisting with discovery, responding to  
22 subpoenas, and conducting dispute-related investigations. Through that work, I am  
23 familiar with the systems and records that, among other things, relate to Roblox  
24 account-holder records and Roblox's account sign-in flow. I make the statements in  
25 this declaration based on my personal knowledge and my review of records maintained  
26 in the ordinary course of Roblox's business. If called as a witness, I could and would  
27 testify competently to the matters stated herein.  
28

1           2. I submit this declaration in support of Roblox’s Motion to Compel  
2 Arbitration in the case captioned *Garcia et al. v. Roblox Corporation*, presently  
3 pending in the U.S. District Court for the Central District of California (“Action”).

4           3. I have reviewed what I understand to be the Complaint (“Complaint” or  
5 “Compl.”) in the Action filed by Plaintiffs Michael Garcia (“Mr. Garcia”), Salena  
6 Garcia (“Ms. Garcia”), and their minor child R.G. (“R.G.”), by her guardian Mr.  
7 Garcia, on behalf of themselves and all others similarly situated (collectively,  
8 “Plaintiffs”), on April 18, 2025.

9           4. Roblox operates an online platform (“Roblox Platform”) that hosts a  
10 virtual universe in which users can create and publish games and virtual experiences,  
11 connect with other users, and acquire or use virtual items such as avatars, apparel, and  
12 accessories.

13           5. Based on my review of the Complaint, I understand that Plaintiffs allege  
14 that Mr. and Ms. Garcia created Roblox accounts for themselves and allowed their  
15 minor twelve-year-old daughter R.G. to use Roblox during the relevant period. *See*  
16 *Compl.*, ¶¶ 10-12.

17           6. I understand counsel for Plaintiffs provided account details for all three  
18 Plaintiffs to Roblox’s attorneys in this Action. This information matched each  
19 Plaintiff to a unique username. Based on the information provided to Roblox’s  
20 counsel, I was able to investigate the details of the accounts for these three individuals.  
21 As discussed in greater detail below, Roblox’s business records show that the first of  
22 those accounts was created on May 22, 2023 and that two additional accounts were  
23 created on March 21, 2025 and March 31, 2025 (collectively, “Accounts”). The  
24 following table illustrates Plaintiffs’ account information as reflected in Roblox’s  
25 records. I have included asterisks (\*) to prevent the complete Username, User ID and  
26 Contact information from being disclosed in this declaration and in a public case filing.  
27 Each asterisk represents a redacted character. I can confirm, however, that the  
28

unredacted information corresponds to the information provided by Plaintiff's counsel.

<b>Username</b>	<b>User ID</b>	<b>Contact</b>	<b>Date</b>
*****grill	*****1228	*****0366	May 22, 2023
*****5764	*****9778	***ger1@gmail.com	March 21, 2025
**6455	*****1828	*****1578	March 31, 2025

7. I have reviewed the Roblox business records associated with the Accounts ("Records"). Roblox maintains these Records in the ordinary course of business, and it is the regular practice of Roblox to create and maintain such Records at or near the time of the acts, events, or transactions the Records reflect.

8. When creating R.G.'s account through the mobile application on May 22, 2023, the user started on a screen with "Sign Up" and "Log In" options. After selecting "Sign Up," the user was prompted to provide a birthday, enter a username and password, and select a "Sign Up" button. Immediately below the "Sign Up" button was the text, prominently featured in contrasting colors from the background: "By clicking Sign Up, you are agreeing to the Terms of Use including the arbitration clause . . ." The user entered a birthday, username, and password, and selected "Sign Up." On both screens, the blue, underlined word "Terms" linked to the Terms of Use ("TOU") then in effect. True and correct screenshots of the mobile sign-up flow as it appeared on May 22, 2023 is attached hereto as **Exhibit 1**.

9. When creating Mr. Garcia's account through the mobile application on March 21, 2025, the user started on a screen with "Create Account" and "Sign In" options. After selecting "Create Account," the user was prompted to provide a birthday, enter a username, and select a "Continue" button. Immediately below the "Continue" button was the following text, prominently featured in contrasting colors from the background: "By clicking Continue, you are agreeing to the Terms of Use including the arbitration clause . . ." The user entered a birthday and username, and

1 selected “Continue.” On both screens, the blue, underlined word “Terms” linked to  
2 the TOU then in effect. The user was then prompted to enter a password and select a  
3 “Done” button. The user entered their password and selected “Done.” True and  
4 correct screenshots of the mobile sign-up flow as it appeared on March 21, 2025 and  
5 March 31, 2025 is attached hereto as **Exhibit 2**.

6 10. When creating Ms. Garcia’s account through the mobile application on  
7 March 31, 2025, the user started on a screen with “Create Account” and “Sign In”  
8 options. After selecting “Create Account,” the user was prompted to provide a  
9 birthday, enter a username, and select a “Continue” button. Immediately below the  
10 “Continue” button was the following text, prominently featured in contrasting colors  
11 from the background: “By clicking Continue, you are agreeing to the Terms of Use  
12 including the arbitration clause . . .” The user entered a birthday and username, and  
13 selected “Continue.” On both screens, the blue, underlined word “Terms” linked to  
14 the TOU then in effect. The user was then prompted to enter a password and select a  
15 “Done” button. See **Ex. 2**.

16 11. Roblox’s records show a Roblox gift card for \$10 was purchased at a 7-  
17 Eleven and redeemed to R.G.’s account on May 22, 2023. On the back of the gift card  
18 were the words “TERMS AND CONDITIONS” printed in large, capitalized, black  
19 text against a white background. Below the title was the statement, “To redeem this  
20 card and use Roblox credits, you must . . . accept the Roblox Terms of Use.” As stated  
21 on the gift card itself, the user needed to agree to the TOU to redeem the gift card. On  
22 the gift card redemption screen, below the box where the user enters the redemption  
23 code, is the following text, prominently featured in contrasting colors from the  
24 background: “By redeeming your code, you represent that you, and your parent or  
25 legal guardian if you are under age 18, agree to our Terms of Use including the  
26 arbitration clause . . .” The user selected “Redeem.” A true and correct screenshot of  
27 the gift card redemption page as it appeared on May 22, 2023 is attached hereto as  
28 **Exhibit 3**.

12. “Robux” is Roblox’s virtual in-game currency. On June 19, 2023, eighty Robux were purchased for R.G.’s account for \$0.99. Because R.G.’s account reflected a user age of less than thirteen, Roblox generated a “Warning” pop-up stating, “This purchase involves the exchange of real money. I agree that I am at least 18 years of age, and am the parent or legal guardian of the account owner. I authorize this purchase and agree to the Terms of Use.” Below the written warning is a conspicuous black triangle containing a white exclamation sign. Below the triangle were the options “OK” and “Cancel.” The user selected “OK” then selected “Buy.” A true and correct screenshot of the Robux purchase flow as it appeared on June 19, 2023 is attached hereto as **Exhibit 4**.

13. In creating their Accounts, redeeming a gift card, and purchasing Robux, Plaintiffs agreed to the following versions of the TOU:

Method	Date Accepted	Version	Exhibit
R.G. Account Creation	May 22, 2023	April 15, 2023	5
Gift Card Redemption to R.G. Account	May 22, 2023	April 15, 2023	5
Robux Purchase for R.G. Account	June 19, 2023	April 15, 2023	5
Mr. Garcia Account Creation	March 21, 2025	March 14, 2025	6
Ms. Garcia Account Creation	March 31, 2025	March 14, 2025	6

True and correct copies of these TOU are attached hereto as **Exhibits 5** and **6**.

14. Each version of the TOU contains an arbitration agreement and provides a thirty-day right to opt out of arbitration.

15. Roblox's records show that R.G. last accessed her account on September 8, 2025, at 22:10:47 UTC.

16. I caused a search of Roblox's arbitration opt-out mailbox and records, and confirm that Roblox never received an opt-out notice from any of the accounts associated with any of the Plaintiffs within thirty days of any acceptance, or at any other time.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 3<sup>rd</sup> day of October, 2025, at San Mateo, California.

DocuSigned by:  
Ronita Camarena  
B87ECBDD59ED4A0